

# EXHIBIT A

**Brian J. Beck**

**From:** Brian J. Beck  
**Sent:** Monday, December 07, 2020 1:13 PM  
**To:** Farnham, Lloyd (USACAN)  
**Cc:** Dawson, Andrew (USACAN); Manny Medrano  
**Subject:** RE: Marcus Andrade

Lloyd,

Following up on my emails of October 30 and November 10, you still have not responded regarding the remaining discovery in this case. As noted in my email on November 10, the first production did not appear to include all copies of search or seizure warrants, supporting affidavits for warrants, ex parte court orders, any non-text media, or any documents related to any negotiations or deals that were made with persons associated with this case. By now any *Brady* material should have been produced.

Also, please let us know who are the points of contact for all the taint and filter teams that were used on each of the search warrants that were conducted with everyone associated with this case.

At the July status hearing, we believe you represented to the Court that you had over a hundred thousand pages of discovery to be produced in this case. However, we have only received about 8,000 pages so far.

With the next status hearing coming in a month, we need to move forward on discovery. We are also deeply concerned that you have not responded to either of my previous emails.

Accordingly, please respond by Thursday, December 10, to let us know a date certain—no later than December 21--by when we will receive the remaining discovery. If we do not get a response or do not receive discovery by those dates, we will file a motion to compel to ensure that the Court can address the government's failure to respond at the January status conference.

Regards



**BRIAN J. BECK**  
 Associate  
 Zuber Lawler & Del Duca LLP  
 135 S. LaSalle Street, Suite 4250  
 Chicago, IL 60603, USA  
 T: +1 (312) 346-1100  
 bbeck@zuberlawler.com | [www.zuberlawler.com](http://www.zuberlawler.com)

**From:** Brian J. Beck <bbeck@zuberlawler.com>  
**Sent:** Tuesday, November 10, 2020 5:18 PM  
**To:** Farnham, Lloyd (USACAN) <Lloyd.Farnham@usdoj.gov>  
**Cc:** Dawson, Andrew (USACAN) <Andrew.Dawson@usdoj.gov>; Manny Medrano <mmedrano@zuberlawler.com>  
**Subject:** RE: Marcus Andrade

Lloyd,

Circling back on my request from October 30, could you please let us know as soon as possible when and about how large the next batch of documents will be?

Also, having reviewed the index from the first production, we noticed that there were few copies of search or seizure warrants, supporting affidavits for warrants, ex parte court orders or any non-text media (such as audio

or video recordings). Additionally there weren't any documents related to any negotiations or deals that were made with persons associated with this case. Could you please let us know if those documents will be in the next batch and if you could promptly let us know when you plan to produce them.

Regards,



**BRIAN J. BECK**  
Associate  
Zuber Lawler & Del Duca LLP  
135 S. LaSalle Street, Suite 4250  
Chicago, IL 60603, USA  
T: +1 (312) 346-1100  
[bbeck@zuberlawler.com](mailto:bbeck@zuberlawler.com) | [www.zuberlawler.com](http://www.zuberlawler.com)

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**From:** Brian J. Beck <[bbeck@zuberlawler.com](mailto:bbeck@zuberlawler.com)>  
**Sent:** Friday, October 30, 2020 11:23 AM  
**To:** Farnham, Lloyd (USACAN) <[Lloyd.Farnham@usdoj.gov](mailto:Lloyd.Farnham@usdoj.gov)>  
**Cc:** Dawson, Andrew (USACAN) <[Andrew.Dawson@usdoj.gov](mailto:Andrew.Dawson@usdoj.gov)>; Manny Medrano <[mmedrano@zuberlawler.com](mailto:mmedrano@zuberlawler.com)>  
**Subject:** RE: Marcus Andrade

Lloyd,

Thanks for sending the first batch of documents; we have received it.

Do you know when, and about how large, the next batch of documents will be?

Regards,



**BRIAN J. BECK**  
Associate  
Zuber Lawler & Del Duca LLP  
135 S. LaSalle Street, Suite 4250  
Chicago, IL 60603, USA  
T: +1 (312) 346-1100  
[bbeck@zuberlawler.com](mailto:bbeck@zuberlawler.com) | [www.zuberlawler.com](http://www.zuberlawler.com)

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**From:** Farnham, Lloyd (USACAN) <[Lloyd.Farnham@usdoj.gov](mailto:Lloyd.Farnham@usdoj.gov)>  
**Sent:** Thursday, October 22, 2020 9:34 AM  
**To:** Brian J. Beck <[bbeck@zuberlawler.com](mailto:bbeck@zuberlawler.com)>  
**Cc:** Dawson, Andrew (USACAN) <[Andrew.Dawson@usdoj.gov](mailto:Andrew.Dawson@usdoj.gov)>; Manny Medrano <[mmedrano@zuberlawler.com](mailto:mmedrano@zuberlawler.com)>  
**Subject:** RE: Marcus Andrade

Brian, that proposed date is fine. We'll prepare a stip.

The first batch of documents is in a zip file of about 8 GB. We can try first to use our document sharing system. It's a little more complicated than a download link, because of security concerns, and it involves registering for an account by receiving a text message with the temporary password. A paralegal in our office, Baron Geluz, is going to handle the logistics of transferring the data to you. Who should he coordinate with?

Thanks,  
Lloyd